

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ELIZABETH PETROSINO, individually on
behalf of herself and all others similarly situated,

Plaintiff,

v.

STEARN'S PRODUCTS, INC. dba DERMA E®

Defendant.

Case No. 7:16 CV-07735-NSR

**DECLARATION OF BARBARA ROLL
IN SUPPORT OF DEFENDANT
STEARN PRODUCTS INC.'S MOTION
TO DISMISS SECOND AMENDED
COMPLAINT FOR LACK OF
PERSONAL JURISDICTION**

I, Barbara Roll, declare as follows:

1. I am the Senior Vice President of Marketing of DERMA E for Defendant Stearn's Products, Inc. ("SPI"), and in that capacity I have personal knowledge regarding the company's books and records, and I am authorized to testify on its behalf. If called to testify as a witness in this matter, I could competently testify to the facts as stated in this declaration.

2. SPI is incorporated under the laws of the State of California and registered with the State of California on June 8, 1984.

3. SPI's headquarters and principal place of business is located in Simi Valley, California, and it has been located there at all times relevant to the allegations of Plaintiff's Second Amended Complaint in this matter.

4. SPI currently has approximately 45 employees in California.

5. SPI has never been headquartered or had a principal place of business in New York, and it is not registered to do business in New York. SPI does not maintain a physical office and/or any other facility in New York, and it does not own or lease any real estate in New York. Further, SPI does not maintain any bank accounts in New York.

I declare under the penalty of perjury that the foregoing is true and correct. Executed this 21st day of June 2018, in Simi Valley, California.



BARBARA ROLL